

UNITED STATES DISTRICT COURT, DISTRICT OF MONTANA, MISSOURI DIVISION

CHANTEL COOPER, Miranda Sherdain
Sunny Ellerwood
PLAINTIFF,
V.

CIVIL ACTION NO.

MAYOR PAUL BAINES

COMMISSIONER WILLIAM BANNON

COMMISSIONER GALE DECKER

COMMISSIONER STEVE STANLEY

SHERIFF DON BELL

UNDERSHERRIFF BEN WOODS

JUDGE DEBORAH KIM CHRISTOPHER

JUDGE JAMES MANLEY

BENJAMIN R. MARCIANO

JAMES LAPOTICA

STEVE ESCHENBACHEN

MOLLY OWEN

ROBERT J. LONG

JAIL STAFF

CITY OF POLSON

DEFENDANTS,

Miranda Sherdain, Sunny Ellerwood.

I, PLAINTIFF CHANTEL COOPER, BEING DULY SWORN ACCORDING TO THE LAW DEPOSE AND SAY THAT I AM THE PLAINTIFF IN THE ABOVE ENTITLED PROCEEDING. I SUBMIT THE FOLLOWING; THE HARRY LORENZO CONSENT DECREE SHALL BE ONGOING IN NATURE AND CONTINUE IN FULL FORCE AND EFFECT TO LEGALLY BIND THE PARTIES FROM THE DATE IT IS APPROVED BY THE COURT, REGARDLESS OF WHETHER ANY OF THE NAMED PLAINTIFF'S RESIDES IN THE DETENTION CENTER AT ANY GIVEN TIME. ALL CURRENT AND FUTURE INMATES OF THE DETENTION CENTER ARE INTENDED BENEFICIARIES OF THIS CONSENT DECREE, WITH FULL RIGHTS TO PETITION TO ENFORCE ITS TERMS. THE FOLLOWING ISSUES THAT WERE RAISED IN 1986 THAT HAVE STILL NOT BEEN RESOLVED ARE AS FOLLOWS,

- 1.) INMATE HOUSING, OVER CROWDING, NO CLASSIFICATION,
- 2.) INADEQUATE ACCESS TO UPDATED LEGAL LAW LIBRARY,
- 3.) INADEQUATE ACCESS TO RELIGIOUS ACTIVITIES,
- 4.) INADEQUATE MEDICAL STAFF TO PASS MEDICATION
- 5.) INADEQUATE FIRE SAFETY EQUIPMENT AND SAFETY ROUTES,

AFFIDAVIT IN
SUPPORT OF COMPLAINT,

6.) INADEQUATE LIGHTING, HEATING, VENTILATION AND NOISE
7.) INSPECTIONS, AND COMPLIANCE VERIFICATION; IN MATE ACCESS
TO CONVENT DECREE. ACKNOWLEDGEMENT OF SCOPE OF RELIEF.

ALL INFORMATION I HAVE SUBMITTED IN SUPPORT OF MY CASE
IS TRUE AND CORRECT, SIGNED UNDER PENALTY OF PERJURY,
DATED THIS 29th day of December, 2021.

X Chantel Cooper
(Prose) CHANTEL COOPER,

(Prose) X Miranda Sheridan
Miranda Sheridan

(Prose) X Sunny Ellwood
Sunny Ellwood